

UNITED STATES DISTRICT COURT
U.S. DISTRICT COURT
DISTRICT OF MAINE
PORTLAND

RECEIVED & FILED
UNITED STATES OF AMERICA)

v. 2018 MAR 29 A 11911) Case No. 2:18-mj-111-JHR
AUSTIN SANTORO) (18 U.S.C. §§ 844(e), 875(c),
DEPUTY CLERK) 1028(a)(7))

CRIMINAL COMPLAINT

I, Derek Dunn, being duly sworn, state that the following is true and correct to the best of my knowledge and belief.

COUNTS ONE THROUGH FIVE
(Transmitting Threatening Interstate Communications)

On about the following dates, in the District of Maine, the defendant,

AUSTIN SANTORO,

knowingly and willfully transmitted in interstate and foreign commerce communications containing threats to injure the person of another. Specifically, SANTORO sent email messages to the following recipients in which he threatened to sexually assault them at gunpoint:

<u>Count</u>	<u>Date</u>	<u>Recipient(s)</u>
One	January 11, 2018	Y.L.
Two	January 19, 2018	B.F.
Three	January 23, 2018	A.M.
Four	January 30, 2018	K.B., M.F., D.G.
Five	January 30, 2018	B.F., A.M., D.R., D.Y., J.A.

In violation of Title 18, United States Code, Section 875(c).

COUNTS SIX AND SEVEN
**(Maliciously Conveying False Information
Concerning Use of an Explosive)**

On about the following dates, in the District of Maine, the defendant,

AUSTIN SANTORO,

through the use of email, an instrument of interstate and foreign commerce, maliciously conveyed false information knowing the same to be false, concerning an alleged attempt being made to kill, injure or intimidate individuals, and unlawfully to destroy a building or personal property by means of an explosive, in and affecting interstate and foreign commerce. Specifically, **SANTORO** sent email messages to the following recipients in which he falsely claimed the existence of a bomb in a building:

<u>Count</u>	<u>Date</u>	<u>Recipient(s)</u>
Six	February 8, 2018	K.S., J.A., D.R., A.M., B.F.
Seven	February 18, 2018	F.W., D.S., M.M.

In violation of Title 18, United States Code, Section 844(e).

COUNTS EIGHT THROUGH ELEVEN
(Identity Theft)

On about the following dates, in the District of Maine, the defendant,

AUSTIN SANTORO,

knowingly used in and affecting interstate and foreign commerce, without lawful authority, a means of identification of another person, specifically the name P.S., knowing that the means of identification belonged to another actual person, with the intent to commit, and in connection with, unlawful activity that constitutes a violation of Federal law. Specifically, **SANTORO** used

the name P.S. when sending email messages on the following dates, in violation of the following statutes and as alleged in the following Counts of this Complaint:

<u>Count</u>	<u>Date</u>	<u>Statute Violated, Count</u>
Eight	January 19, 2018	18 U.S.C. § 875, Count Two
Nine	January 23, 2018	18 U.S.C. § 875, Count Three
Ten	January 30, 2018	18 U.S.C. § 875, Count Four
Eleven	February 8, 2018	18 U.S.C. § 844(e), Count Six

In violation of Title 18, United States Code, Section 1028(a)(7).

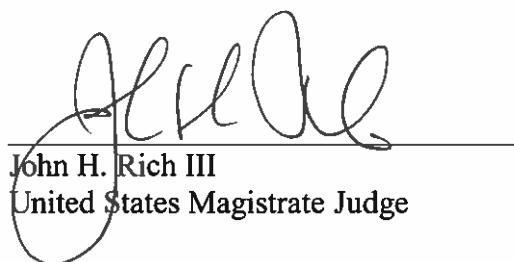
I further state that I am a Special Agent with Homeland Security Investigations, and that this complaint is based on the facts contained in the attached affidavit, which is incorporated by reference herein.

Dated at Portland, Maine this 29th day of March, 2018.



Derek Dunn
Special Agent, HSI

Sworn and subscribed to before me this 29th day of March, 2018.



John H. Rich III
United States Magistrate Judge